

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

ASHLEY HARVEY, Individually and  
as Next Friend of L. H., a Minor

*Plaintiff,*

VS.

CARTHAGE INDEPENDENT SCHOOL  
DISTRICT, OTIS AMY, SCOTT SURRATT  
AND DR. JOSEPH GLENN HAMBRICK

*Defendant.*

**§ § 87(2)(b), (g)**

Cause No. 2:18-CV-00164  
JURY TRIAL DEMANDED

## **PLAINTIFF'S DESIGNATION OF EXPERTS**

ASHLEY Harvey, Individually and as Next Friend of L.H., a Minor, (hereinafter referred to as “Plaintiff”) serves this Designation of Experts pursuant to the Docket Control Order (ECF 19) in this case, and would respectfully show this Honorable Court as follows:

I.

### Retained Expert Witnesses

The following retained experts will testify concerning matters within their expertise and more specifically to those opinions described in their reports served herewith. Each report and accompanying CV, disclose the matters required in Fed. R. Civ. Pro. 26.<sup>1</sup>

1. Katy L. Britt-Sharp, LSSP, PsyD  
Waco Psychological Associates, PC  
8401 Old McGregor Road  
Waco, TX 76712  
(254) 751-1550

<sup>1</sup> A report and CV for each retained designated expert has been served on counsel by e-mail today.

2. A. Patrick Huff, Ph.D.  
Cell Phone: 281-794-8108  
E-mail: aphuff51@gmail.com
3. Jennifer J. Freyd  
Department of Psychology  
University of Oregon  
Eugene, OR 97430  
jjf@uoregon.edu

II.

Non-retained experts.

Plaintiff hereby designates and states that Plaintiff intends to call for the purpose of fact and/or opinion testimony those persons listed in the witness disclosures of each party, as appropriate. Plaintiff makes this designation without conceding the qualifications, relevancy, reliability or admissibility of such witness' opinions.

Without limitation of the foregoing, Plaintiff hereby designates the following persons who are identified and described with contact information in Plaintiff's most recent disclosures.

Timothy Harkrider  
14733 Lepus Drive  
Willis, TX 77318

Mr. Harkrider is a distant family member to Plaintiff and is also an experienced and trained school administrator who currently serves as Superintendent of the Willis ISD. Mr. Harkrider gave informal advice to Plaintiff as they reported to Defendants the conduct at issue in this case. Upon information and belief, Mr. Harkrider will testify in detail that Defendants acted in a manner in violation of state and federal policy and not in a manner that a reasonable school administrator would under the same or similar circumstances. Mr.

Harkrider will testify as to the proper steps that should have been undertaken at each interval and will give his opinions based upon his training, education and experience.

Christopher Hardy  
527 W College St.  
Carthage, TX 75633  
(903) 631-2067

Mr. Hardy is the former police chief for Carthage ISD. It is expected that he will testify to facts and circumstances concerning this case. He will also be called to provide testimony of the proper procedures in this case and the normal response of administrators and police to reports such as this. Ofc. Hardy may be asked to provide testimony on any matter in his expertise.

Beverly Christiansen, MS LPC  
1800 Judson Rd. #300  
Longview, TX 75605  
(903) 242-9555

Genesis Primecare  
Tracy Hicks DNP, APRN, PMHNP-BC, FNP-BC, CARN-AP  
P.O. Box 7083  
Longview, TX  
(903) 576-2629

Dr. Neslihan Gungor  
LSU Shreveport, Pediatric Endocrinology  
1501 Kings Hwy.  
Shreveport, LA 7130  
(318) 675-6070

Plaintiff may offer fact and opinion testimony from each of the medical providers reflected in Plaintiff's medical records and, without limitation, to those disclosed by Plaintiff in their witness disclosures.

Burton Reavis  
Joe Padgitt  
Contact information unknown  
Other unknown Federal Bureaus of Investigation employees involved in their investigation

Other unknown Homeland Security employees involved in their investigation

Any contractors, experts or advisors who were involved in the criminal investigation

The above individuals could be called to testify about any evidence, witness interviews and/or other material collected during their investigation. Testimony and/or records may be offered from this investigation including, without limitation, evidence collected concerning the timing and distribution. To the extent these person's have expert testimony to offer, they are designated for that purpose. Also, any state or local law enforcement personnel or contractors are designated as to matters within their personal knowledge or expertise, without prejudice to challenging their qualifications or admissibility of their opinions.

### III.

#### Additional Designation

Plaintiff hereby cross designates and states that Plaintiff may call any expert witness identified or designated by any party or any employee or representative of any party, subject to any objections that Plaintiff may make concerning the designation or qualifications of those witnesses.

Plaintiff reserves the right to elicit by way of cross examination, opinion testimony from experts or corporate representatives or other witnesses who may be qualified to render expert testimony designated and/or called by other parties to the suit.

Plaintiff reserves the right to elicit by way or direction/cross examination, opinion testimony from fact witnesses who may be qualified to render testimony, but are not retained or designated experts at this time and who have expertise in certain areas regarding the facts of this case. Such non-retained expert witnesses may be employees of Carthage ISD but they have not been employed for the purpose of providing expert testimony.

Plaintiff reserves the right to elicit by way of direct/cross examination, opinion testimony for experts designated and/or called by other parties to the suit.

Plaintiff reserves the right to call any expert witness of any party who may be added to this lawsuit.

Dated this 4th day of October, 2018.

Respectfully submitted,

**BRAZIL & DUNN, L.L.P.**

/s/ Chad W. Dunn

Chad W. Dunn

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Houston, Texas 77069

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**DUNNAM & DUNNAM, L.L.P.**

Jim Dunnam (Eastern District Application  
Pending)

State Bar No. 06258010

Eleeza Johnson

State Bar No. 24058690

Andrea Mehta

State Bar No. 24078992

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Waco, Texas 76710

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eleezajohnson@dunnamlaw.com

andreamehta@dunnamlaw.com

ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing document has been sent via the Court's electronic filing system to counsel for Defendant on October 4, 2018.

/s/ Chad W. Dunn

Chad W. Dunn